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June 29, 2020

Via ECF

The Honorable Vernon S. Broderick  
United States District Judge  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, NY 10007

**Re: *In re Application of Hornbeam Corp.* (No. 14 Misc. 424, Part 1, S.D.N.Y (VSB)**

Dear Judge Broderick:

On behalf of Intervenor Panikos Symeou (“**Symeou**”), we are writing to request an extension until **July 22, 2020**, to file Symeou’s response in opposition to the Motion to Intervene and Unseal (ECF 196, 197), filed on June 24, 2020 by BuzzFeed, Inc. (“**BuzzFeed**”).

In accordance with Rule 1(G) of Your Honor’s Individual Rules and Practices in Civil Cases, Symeou responds as follows:

- (1) the original due date: Symeou’s response is currently due on July 8, 2020;
- (2) the number of previous requests for extensions of time: None;
- (3) whether the previous requests were granted or denied: N/A;
- (4) whether the adversary consents: Counsel for BuzzFeed consents to this request; and
- (5) the specific reasons for the extension of time: Our office is lead counsel for Symeou and attorney Bruce Marks is away this entire week with family and will return after the 4<sup>th</sup> of July holiday weekend. Further, we have significant filings due in other matters on July 6 and July 14, 2020, which were scheduled long ago. Moreover, until June 22, 2020, we were unaware that BuzzFeed may move to intervene in this proceeding to unseal documents and, thus, could not have anticipated scheduling the work. Finally, our offices are continuing to operate remotely at present due to COVID-19.

Also, as required by Rule 1(G), Symeou notes that this requested extension affects no dates because no events are currently scheduled in this matter.

Respectfully,  
Thomas C. Sullivan  
**Marks & Sokolov, LLC**

cc: ECF Service Recipients